

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Relay Service)	CC Docket No. 98-67
And Speech-to-Speech Services)	(DA 02-1826)
For Individuals with)	
Hearing and Speech Disabilities)	

REPLY OF NENA, APCO and NASNA

The National Emergency Number Association (“NENA”), the Association of Public-Safety Communications Officials-International, Inc. (“APCO”) and the National Association of State Nine One One Administrators (“NASNA”) hereby reply to the comments of others in the captioned proceeding. All but three of the organizations submitting extended remarks support the change from “nearest” to “appropriate” Public Safety Answering Point (“PSAP”) to describe, in Section 64.04 of the Rules, the routing of 9-1-1 calls through TRS centers. This reply takes up the views of the three.

The objective should be to get the emergency caller via TRS to the appropriate PSAP for the originating address/location, in order to provide equivalent service to the hearing- or speech-impaired caller, without that caller having to make a second call. Thus, we cannot accept the AT&T “two-tiered approach” of (1) a hang-up from TRS and a direct dial to 9-1-1, followed by (2) “a redundant call back-up from TRS.” (Comments, 4)¹

¹ We agreed (Comments, 1) that “the fastest and most direct way of reaching emergency assistance is by dialing 9-1-1,” but not at the risk of a hang-up from TRS.

Getting the call to the appropriate PSAP, as above, does not require that the TRS organization be able to duplicate the E 9-1-1 selective routing process, but only that it make use of the E 9-1-1 process already in place. Today that typically means three-way conference calling using a 7-to-10 digit PSAP number, but tomorrow the path may be different. It is more appropriate for TRS to establish the means for this path, in conjunction with NENA technical developments, than to parallel the E 9-1-1 process at a much higher cost and time delay.

There are times when it may be appropriate for TRS operators to use a hierarchical process. If the caller cannot supply an address/location for the TRS center to use in determining the appropriate PSAP for that location -- through a mechanism such as the NENA PSAP Registry -- the center can fall back on the ostensibly less accurate method of the NPA V&H coordinates. Such data items could easily be combined in a look-up data base that carries both the address-related routing information and the NPA V&H data, for use where only the NPA is known for the call.

The above considerations, we believe, address the concerns expressed by two other skeptical commenters, Sprint and CSD. We must continue to seek improved location and routing accuracy as better methods become available. As noted in our Comments, the use of 911 NXX for the PSAP or the Selective Router access would be an opportunity for a more accurate and

easily-utilized method toward that end. TRS operators should remain open to using the best methods as they become available, and remain involved in developing those better methods.

Respectfully submitted,

NENA, APCO and NASNA

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